



1 REBECCA J. WINTHROP(CA Bar No. 116386)

2 ROBIN D. BALL (CA Bar No. 159698)

Signed and Filed: November 29, 2021

3 NORTON ROSE FULBRIGHT US LLP

4 555 South Flower Street, Forty-First Floor

5 Los Angeles, California 90071

6 Telephone: (213) 892-9200

7 Facsimile: (213) 892-9494

8 rebecca.winthrop@nortonrosefulbright.co

9 robin.ball@nortonrosefulbright.com

DENNIS MONTALI

U.S. Bankruptcy Judge

10 Attorneys for Fire Victim Claimants ADVENTIST

11 HEALTH SYSTEM/WEST, and FEATHER RIVER

12 HOSPITAL d/b/a ADVENTIST HEALTH FEATHER

13 RIVER

14 UNITED STATES BANKRUPTCY COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 In re:

Case No. 19 – 30088 (DM)

18 PG& E CORPORATION

Chapter 11

19 - and -

(Lead Case) (Jointly Administered)

20 PACIFIC GAS AND ELECTRIC  
21 COMPANY,

**ORDER GRANTING MOTION OF  
ADVENTIST HEALTH SYSTEM/WEST  
AND ADVENTIST HEALTH FEATHER  
RIVER TO FILE CERTAIN EXHIBITS  
UNDER SEAL AND IN REDACTED FORM  
IN SUPPORT OF THEIR OPPOSITION TO  
MOTION OF FIRE VICTIM TRUSTEE  
PURSUANT TO FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 2004 FOR  
ENTRY OF AN ORDER AUTHORIZING  
DISCOVERY FROM ADVENTIST  
HEALTH SYSTEM/WEST AND  
ADVENTIST HEALTH FEATHER RIVER  
AND SERVICE OF A SUBPOENA ON  
FACTORY MUTUAL INSURANCE  
COMPANY**

22 Debtors.

[No Hearing Requested]

- 23
- 24 ☐ Affects PG&E Corporation
- 25 ☐ Affects Pacific Gas and Electric  
Company
- 26 ☒ Affects both Debtors

27 \* All papers shall be filed in the Lead Case,  
28 No. 19-30088 (DM).

1           Upon the Motion, dated November 23, 2021 (the “Redaction Motion”), of Adventist  
2 Health System/West and Feather River Hospital d/b/a Adventist Health Feather River, each a  
3 California religious non-profit corporation (and together, “Adventist”), filed in the above-entitled  
4 cases, and pursuant to sections 105(a) and 107(b) of title 11 of the United States Code (the  
5 “Bankruptcy Code”), Federal Rule of Bankruptcy Procedure 9018, Rule 1001-2(a) of the  
6 Bankruptcy Local Rules for the United States District Court for the Northern District of  
7 California (the “Local Rules”) and the *Procedures for Filing Redacted or Sealed Confidential or*  
8 *Highly Sensitive Documents* adopted by the United States Bankruptcy Court for the Northern  
9 District of California (the “Local Procedures”), for entry of an order (i) authorizing Adventist to  
10 file with certain limited redactions the *Declaration of Rebecca J. Winthrop in Support of*  
11 *Opposition of Adventist Health System/West and Adventist Health Feather River to Motion of the*  
12 *Fire Victim Trustee Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an*  
13 *Order Authorizing Discovery from Adventist Health System/West and Adventist Health Feather*  
14 *River and Service of a Subpoena on Factory Mutual Insurance Company* (the “Winthrop Opp.  
15 Decl.”), and (ii) directing that the unredacted copies of the Winthrop Decl. provided to the Court  
16 shall remain under seal and confidential and not be made available to anyone except the Trust<sup>1</sup>  
17 without the consent of Adventist or further order from the Court; and the Court having found and  
18 determined that notice of the Redaction Motion as provided to the parties listed on the Certificate  
19 of Service attached thereto is reasonable and sufficient, and it appearing that no other or further  
20 notice need be provided; and this Court having reviewed the Redaction Motion and the  
21 Declaration of Rebecca J. Winthrop submitted in support thereof; and this Court having  
22 determined that the legal and factual bases set forth in the Redaction Motion establish just cause  
23 for the relief granted herein; and it appearing that the relief requested in the Redaction Motion is  
24 in the best interests of Adventist and is fair and equitable, and good cause appearing therefor,

25           **IT IS HEREBY ORDERED THAT:**

- 26           1.       The Redaction Motion is granted as provided herein.

27  
28           <sup>1</sup> Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Redaction Motion.

1           2.       Notice of the Redaction Motion as provided therein shall be deemed good and  
2 sufficient and the requirements of the Local Rules are satisfied by such notice.

3           3.       Adventist is authorized to file a redacted copy of the Winthrop Opp. Decl.  
4 pursuant to section 107(b) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 9018,  
5 the Local Rules and the Local Procedures.

6           4.       The unredacted copy of the Opposition and the Winthrop Opp. Decl. provided to  
7 the Court is confidential, shall remain under seal, and shall not be made available to anyone other  
8 than the Trust without the consent of Adventist.

9           5.       Any documents or memoranda subsequently filed by Adventist in connection with  
10 the Winthrop Opp. Decl. shall be treated in the same fashion as the Winthrop Opp. Decl. with  
11 respect to the redaction of confidential material, without further order of the Court.

12          6.       The Reorganized Debtors are authorized to take all necessary actions to effectuate  
13 the relief granted pursuant to this Order in accordance with the Redaction Motion.

14          7.       This Court shall retain jurisdiction to hear and determine all matters arising from  
15 or related to the implementation, interpretation, or enforcement of this Order.

16                               \*\* END OF ORDER \*\*